

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Objection Deadline: March 7, 2024, at 4:00 p.m. (ET)

Hearing Date: March 14, 2024 at 3:00 p.m. (ET)

**COVER SHEETS FOR SECOND INTERIM APPLICATION OF
SILVERMAN CONSULTING FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
OCTOBER 1, 2023 TO AND INCLUDING DECEMBER 31, 2023**

Name of Applicant: Silverman Consulting

Authorized to Provide Professional Services to: Debtors and Debtors in Possession

Date of Retention: Effective June 27, 2023

Period for Which Compensation and Reimbursement Are Requested: October 1, 2023 – December 31, 2023

Total Amount of Compensation (100%): \$590,997.00

Amount of Compensation Requested by Prior Monthly Fee Applications (80%): \$472,797.60

Amount of Compensation Held Back from Prior Monthly Fee Applications (20%): \$118,199.40

Total Amount of Expense Reimbursement: \$29,630.69

Aggregate Amount of Compensation and Expense Reimbursement \$620,627.69

This is an interim fee application.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

MONTHLY FEE APPLICATIONS FILED

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
		Requested		Approved On Monthly Basis		Holdback	Total Approved By Interim Order		
Date; D.I.	Period Covered	Fees	Expenses	Fees	Expenses	Fees	Expenses	Fees	Expenses
8/22/2023 D.I. 291	6/27/2023 – 7/31/2023	\$183,620.20	\$11,136.91	\$146,896.16	\$11,136.91	\$36,724.04	\$0	\$0	\$0
9/25/2023 D.I. 468	8/1/2023 – 8/31/2023	\$252,638.00	\$21,241.92	\$202,110.40	\$21,241.92	\$50,527.60	\$0	\$0	\$0
10/25/2023 D.I. 616	9/1/2023 – 9/30/2023	\$222,236.50	\$18,921.16	\$177,789.20	\$18,921.16	\$44,447.30	\$0	\$0	\$0
11/14/2023 D.I. 694	6/27/2023 – 9/30/2023	\$0	\$0	\$0	\$0	\$0	\$0	\$131,698.94	\$0
11/20/2023 D.I. 719	10/1/2023 – 10/31/2023	\$249,418.50	\$22,515.18	\$199,534.80	\$22,515.18	\$49,883.70	\$0	\$0	\$0
12/21/2023 D.I. 853	11/1/2023 – 11/30/2023	\$201,120.50	\$5,793.83	\$160,896.40	\$5,793.83	\$40,224.10	\$0	\$0	\$0
1/22/2024 D.I. 927	12/1/2023 – 12/31/2023	\$140,458.00	\$1,321.68	\$112,366.40	\$1,321.68	\$28,091.60	\$0	\$0	\$0

**SUMMARY OF TOTAL FEES AND HOURS
BY PROFESSIONALS**

Name	Title	Hours	Rate	Fee Amount
Constadinos D. Tsitsis	Partner	113.50	\$525	\$59,587.50
Scott Kohler	Partner	374.50	\$525	\$196,612.50
Steven A. Nerger	Partner	31.50	\$350	\$11,025.00
Alex Bauer	Director	10.00	\$320	\$3,200.00
Ellen Hammes	Associate	398.30	\$290	\$115,507.00
Michael Mollerus	Associate	250.00	\$270	\$67,500.00
Alex Crnkovich	Associate	509.50	\$270	\$137,565.00
Grand Total		1,687.30	350.26	\$590,997.00

STATEMENT OF FEES AND EXPENSES BY PROJECT CATEGORY

Cat. No.	Project Category Description	Total Hours	Total Fees
1-1	Preparation of Budgets, Availability Reports, Business Evaluation and Flash Reports	151.30	\$44,360.50
1-2	Preparation of Financial Data to Support Motions	166.70	\$58,730.00
1-3	Preparation of Financial Projections	3.60	\$986.00
1-5	Preparation of Plan and Disclosure Statement	16.60	\$5,754.00
2-1	Daily Management and Operations	156.60	\$54,684.00
2-4	Sale of Company matters	14.20	\$7,455.00
4-2	Case Administration	1,081.40	\$385,666.00
4-3	Monthly Operating Reports	44.90	\$14,968.00
4.5	Fee Application Preparation	52.00	\$18,393.50
Grand Total		1,687.30	\$590,997.00

EXPENSE SUMMARY

Description	Bill Amount
Administrative	\$2,324.16
Airfare	\$9,325.44
Meals	\$2,705.43
Lodging	\$9,133.40
Transportation	\$6,142.26
Grand Total	\$29,630.69

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Chapter 11

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Objection Deadline: March 7, 2024, at 4:00 p.m. (ET)

**SECOND INTERIM APPLICATION OF
SILVERMAN CONSULTING FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
OCTOBER 1, 2023 TO AND INCLUDING DECEMBER 31, 2023**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals and Committee Members* [Docket No. 181] (the “**Interim Compensation Procedures**”), Silverman Consulting (“**Silverman**”), restructuring advisors for the debtors and the debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 case, hereby files this second interim application (this “**Application**”) for the period from October 1, 2023 to and including December 31, 2023 (the “**Application Period**”) requesting (a) interim allowance and payment of \$620,627.69, consisting of (i) compensation for professional services to the Debtors in the amount of \$590,997.00, representing 100% of the fees earned by Silverman for professional services to the Debtors during the Application Period, and (ii) reimbursement of 100% of the actual and necessary expenses incurred by Silverman during the Application Period in connection with such services in the amount of \$29,630.69, without prejudice to Silverman’s right to seek additional compensation for

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services performed and expenses incurred during the Application Period, if any, which were not processed at the time of this Application, and (ii) such other and further relief as is just and proper.

Specifically, Silverman requests that the Court award interim allowance of the compensation and reimbursement expenses that were the subject of the following Monthly Fee Applications (as defined below) that covered the Application Period.

On November 20, 2023, Silverman filed its fourth monthly fee application (the “**Fourth Monthly Fee Application**,”) for the period of October 1, 2023 to and including October 31, 2023 [Docket No. 719]. Pursuant to the Interim Compensation Procedures, Silverman has been paid \$222,049.98, representing \$199,534.80 (80% of the \$249,418.50 of fees earned) and \$22,515.18 in expenses, and \$49,883.70 in fees have been held back.

On December 21, 2023, Silverman filed its fifth monthly fee application (the “**Fifth Monthly Fee Application**”) for the period of November 1, 2023 to and including November 30, 2023 [Docket No. 853]. Pursuant to the Interim Compensation Procedures, Silverman has been paid \$166,690.23, representing \$160,896.40 (80% of the \$201,120.50 of fees earned) and \$5,793.83 in expenses, and \$40,224.10 in fees will have been held back.

On January 22, 2024, Silverman filed its sixth monthly fee application (the “**Sixth Monthly Fee Application**,”) for the period of December 1, 2023 to and including December 31, 2023 [Docket No. 927]. Pursuant to the Interim Compensation Procedures, Silverman has been paid \$113,688.08, representing \$112,366.40 (80% of the \$140,458.00 of fees earned) and \$1,321.68 in expenses, and \$28,091.60 in fees will have been held back.

As set forth in the Monthly Fee Applications, the compensation and reimbursement expenses that were the subject of the Monthly Fee Applications reflected voluntary reductions made by Silverman before filing of, in the aggregate, \$70,389.50 in fees and \$0 in expenses.

WHEREFORE, Silverman requests the entry of an order granting (a) interim allowance and payment of \$620,627.69, consisting of (i) compensation for professional services to the Debtors in the amount of \$590,997.00, representing 100% of the fees earned by Silverman for professional services to the Debtors during the Application Period, and (ii) reimbursement of 100% of the actual and necessary expenses incurred by Silverman during the Application Period in connection with such services in the amount of \$29,630.69, without prejudice to Silverman's right to seek additional compensation for services performed and expenses incurred during the Application Period, if any, which were not processed at the time of this Application, and (b) such other and further relief as is just and proper

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Dated: February 9, 2024
Chicago, Illinois

Respectfully submitted,

SILVERMAN CONSULTING

/s/Constadinos D. Tsitis

Constadinos D. Tsitsis

Partner